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9 *Attorneys for Plaintiff*  
10 *Megan Klatt, on behalf of herself*  
10 *and all others similarly situated*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 MEGAN KLATT, an individual, on behalf  
14 of herself and all others similarly situated,

Case No.: 2:17-cv-02425-RFB-BNW

15 Plaintiff,

16 vs.

17 DIGNITY HEALTH, a California  
18 corporation; DOES 1-50, unknown  
18 individuals; and ROE COMPANIES 1-50,  
19 unknown business entities,

**STIPULATION AND ORDER TO  
CONTINUE SETTLEMENT  
DOCUMENTS DEADLINE (Second  
Request)**

19 Defendants.

21 Plaintiff Megan Klatt (“Plaintiff”), by and through her attorneys of record, and Defendant  
22 Dignity Health (“Defendant”) (collectively, the “Parties”), by and through its attorneys of record,  
23 submit this Stipulation and Order to Continue Settlement Documents Deadline (Second Request)  
24 (the “Stipulation”).

25 On February 28, 2019, the Parties participated in a mediation and subsequently reached a  
26 settlement in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order

1 to Suspend Dispositive Motion Deadlines Pending Settlement (“Stipulation to Suspend”),  
2 requesting that the dispositive motion deadlines be suspended while the Parties worked diligently  
3 to draft and agree upon the requisite settlement documents, ECF No. 86.

4 On April 10, 2019, the Court issued an Order granting the Stipulation to Suspend and  
5 directed the Parties to file a stipulation to dismiss or dispositive motions by May 17, 2019, ECF  
6 No. 87.

7 On May 16, 2019, the Parties filed a Stipulation and Order to Continue Settlement  
8 Documents Deadline (First Request), ECF No. 89, which the Court granted on May 17, 2019,  
9 ECF No. 93, because they needed additional time to complete the drafting of the settlement  
10 documents given the complexity of the issues and length of documents, including a Joint Motion  
11 for Preliminary Approval of Class Action Settlement and the associated Joint Stipulation of  
12 Settlement, as well as various documents to be provided to the putative class members, which will  
13 require Court approval.

14 Since then, the Parties have continued to work diligently to finalize the settlement papers  
15 and have exchanged multiple drafts of the settlement papers. The Parties are close to finalizing  
16 those papers, but need a short extension of time to complete the documents. The Parties  
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1 anticipate being able to submit the papers for Court approval on or before July 10, 2019. As such,  
2 the Parties respectfully request an additional nine (9) days to submit the necessary, up to and  
3 including July 10, 2019.

4 This Stipulation is submitted in good faith and not for the purpose of delay.  
5

6 DATED: July 1st, 2019

SEMENTZA KIRCHER RICKARD

7 /s/ Lawrence J. Semenza, III

8 Lawrence J. Semenza, III, Bar No. 7174  
Christopher D. Kircher, Bar No. 11176  
9 Jarrod L. Rickard, Bar No. 10203  
10 10161 Park Run Drive, Suite 150  
Las Vegas, NV 89145

11 *Attorneys for Plaintiff, on behalf of  
herself and all others similarly situated*

12 DATED: July 1st, 2019

JACKSON LEWIS P.C.

13 /s/ Kirsten A. Milton

14 Kirsten A. Milton, Bar No. 14401  
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15 300 S. Fourth Street, Suite 900  
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17 *Attorneys for Defendant*

18 **IT IS SO ORDERED.**

19   
20 UNITED STATES MAGISTRATE JUDGE  
21 DATED this 3rd day of July 2019.